

**U.S. DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
(Amarillo)**

STATE OF TEXAS, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	
v.	)	No. 2:21-cv-00067-Z
	)	
JOSEPH R. BIDEN, JR. in his official	)	
capacity as President of the United	)	
States of America, <i>et al.</i> ,	)	
	)	
<i>Defendants.</i>	)	

**AMENDED CONSENT MOTION TO SUBSTITUTE COUNSEL AND  
MOTION FOR LEAVE TO PROCEED WITHOUT LOCAL COUNSEL**

Now comes Plaintiff State of Missouri, by and through the undersigned counsel, requesting the Court (1) grant permission to withdraw Michael E. Talent and substitute Maria A. Lanahan as attorney of record for said Plaintiff per N.D. Tex. L. Civ. R. 83.12(d) and (2) grant Missouri leave to proceed without local counsel per N.D. Tex. L. Civ. R. 83.10(a). In support of these Motions, Plaintiff Missouri states as follows:

1. Application for Admission Pro Hac Vice was filed by Michael E. Talent on June 30, 2022.
2. On July 1, 2022, this Court granted the Application for Admission.

3. Michael E. Talent has taken employment outside of the Office of the Missouri Attorney General and Plaintiff State of Missouri consents to representation by the undersigned counsel, Maria A. Lanahan.

4. Maria A. Lanahan is a member of the bar of the U.S. District Court for the Northern District of Texas.

5. Further, Plaintiff State of Missouri moves for leave to proceed without local counsel.

6. Though Missouri does not have local counsel through a member of the bar of this Court who resides and maintains his or her principal office in the Northern District of Texas and whose residence or principal office is located within 50 miles of the courthouse in Amarillo, Missouri does have Texas counsel—Ryan D. Walters, Office of the Attorney General of Texas, 300 W. 15<sup>th</sup> Street, Austin, TX 78701; phone: 512-936-2714; fax: 512-457-4410.

7. Thus, Missouri moves to for leave to proceed with Texas counsel, but without local counsel.

8. Counsel for Defendants consented to these motions.

WHEREFORE, Plaintiff State of Missouri requests this Court enter an order allowing Maria A. Lanahan to substitute as counsel of record in this case and an order allowing Missouri to proceed without local counsel.

Respectfully submitted,

**ANDREW BAILEY**

Attorney General

/s/ Maria A. Lanahan

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*Counsel for Plaintiff State of Missouri*

### **CERTIFICATE OF CONFERENCE**

I hereby certify that I have received consent for this substitution of counsel motion and motion to proceed without local counsel from Defendants' counsel, so this motion is unopposed.

/s/ Maria A. Lanahan

### **CERTIFICATE OF SERVICE**

This is to certify that on April 17, 2023 a true and correct copy of the foregoing was served upon all parties of record, by the CM/ECF system.

/s/ Maria A. Lanahan